

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

THOMAS E. PEREZ, Secretary of Labor,
United States Department of Labor

Plaintiff,

v.

Civil Action No. 4:14-CV-997-O

DALLAS-FORT WORTH DOMICILE,
ALLIED PILOTS ASSOCIATION,

and

ALLIED PILOTS ASSOCIATION,
NATIONAL HEADQUARTERS,

Defendants.

PLAINTIFF'S EXPERT WITNESS DESIGNATION

Plaintiff, the Secretary of Labor, designates the following as an expert witness who will testify at trial regarding the issues of whether the Internet voting system used by Defendants in their April 1, 2014 DFW Domicile election effectuated an election by secret ballot and provided adequate safeguards to insure a fair election with respect to observability rights:

Dan S. Wallach
Professor, Department of Computer Science
Rice University
6100 Main Street, MS132
Houston, TX 77005

The Secretary is otherwise complying with Rule 26(a)(2) of the Federal Rules of

Civil Procedure by today disclosing directly to Defendants the materials called for in Rule 26(a)(2)(B).

Respectfully submitted,

JOHN R. PARKER
United States Attorney

/s/ Brian W. Stoltz
Brian W. Stoltz
Assistant United States Attorney
Texas Bar No. 24060668
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214-659-8626
Facsimile: 214-659-8807
brian.stoltz@usdoj.gov

Attorneys for Plaintiff

Certificate of Service

On September 11, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Brian W. Stoltz
Brian W. Stoltz
Assistant United States Attorney